



MEMORANDUM

TO: Toni Jones, U.S. Environmental Protection Agency

FROM: Eastern Research Group, Inc.

DATE: January 11, 2011

SUBJECT: CISWI Test Data Database – Post Proposal Data Corrections

This memorandum summarizes the data revisions made to the Commercial Industrial Solid Waste Incinerators (CISWI) unit database after the rule's proposal date. Details about the database and its initial development can be found in the CISWI Test Data Database memorandum, dated April 26, 2010. The data discussed in this memorandum reflects the data utilized in preparation of the final standards.

The attached MS Excel file, Post Proposal Data Corrections_100810.xlsx, contains corrections, additions, deletions, and accompanying notes, where applicable, to track the changes made in the CISWI database. Individual tabs are explained in further detail below.

1.0 LATE ARRIVING ICR DATA

EPA received additional ICR test data late December 2009 and early in 2010, but due to the court-ordered proposal deadline did not have sufficient time to review and evaluate the additional data and revise the analyses before the standards were proposed. Since proposal, data from all additional test reports provided has been reviewed and incorporated into the final standards, as appropriate.

The "NewRecordsExtracted-QAed" tab in the attached file contains data extracted from all test reports that were received too late to incorporate into the proposed standards. Gray cells indicate records that were appended to the database. For other records, certain issues such as duplicate test data, ambiguous data, or inapplicable test methods are denoted in the comments, and data edits are made in red text.

2.0 CISWI COMMENT PERIOD - ADDITIONAL DATA PROVIDED

During the comment period, additional emissions data were submitted to EPA to be incorporated into the emissions data set. Much of the data, however, could not necessarily be incorporated into the MACT Floor analysis because only averages were provided. The "NewRecordsFromComments" tab in the attached file contains the extracted records, including associated concerns or comments about the data.

3.0 CISWI COMMENT PERIOD – DATA CORRECTIONS PROVIDED

During the comment period, corrections to the emissions data set used for the proposal analyses were submitted. Not all submitted data was useful (e.g. not enough details provided to justify overwriting test data already in the database), but all potential corrections are listed in the “EditsToProposed” tab of the attached file. This spreadsheet lists all of the emissions data housed in the CISWI database at the time of proposal. Records that were revised are indicated in gray highlighted cells; specific data that was revised is marked in red text. Where applicable, comments are included to further describe the submitted correction and explain what action was taken.

4.0 ADDITIONAL HYDROGEN CHLORIDE DATA – INCORPORATING METHOD 321 FOR KILNS

It was determined after proposal that using any test method other than Method 321 for hydrogen chloride is not appropriate for waste-burning kilns. Therefore, test reports for units in this subcategory were revisited, and additional HCl data was extracted for all Method 321 tests. These additional emissions records can be found in the “New Records HCL Method 321” tab of the attached file. Again, records appended to or revised in the database are highlighted in gray, and comments describing actions taken are included.

5.0 OTHER DATA CORRECTIONS

For cases where other data types (i.e. data not specifically relating to emissions tests) required corrections, revisions are recorded in the “Other Corrections” tab of the attached file. This includes such changes as unit removal from the inventory or changes to the subcategory assigned to a given CISWI unit.